

# **FIELD OPERATIONS BUREAU**

## **FOOD STAMP UNIT (FSU)**

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**TRANSMITTAL NUMBER: 09-09**

**July 30, 2009**

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**TO:** All Food Assistance Action Committee (FAAC) Members  
and Field Operations Bureau (FOB) Staff

**SUBJECT/PURPOSE:** Procedures When Case Reviews Cannot Be Completed

**RELATED REFERENCE:** FNS Handbook 310 Sections 330-338, 442- 442.3

**SUPERSEDES:** Transmittal 99-04

**EFFECTIVE DATE:** Upon Receipt

### **BACKGROUND:**

The Food and Nutrition Service (FNS) reviews the State's sampled cases in order to validate the error rate. The official error rates are based on the Federal validation reviews of the State's case sample. As part of this process, FNS examines all cases in which reviews were not completed to see if they were appropriately dropped from the case universe. Those that FNS agrees were correctly dropped as 'Not Subject To Review' (Code 2) have a minimum impact against the state's case completion rate. However, case reviews dropped as 'Incomplete' (Code 3) have a greater negative impact on the state's completion rate and an adjustment is made to the final error rate. To avoid the adjustment, the State must complete 98 percent of sample. For FFY 2008 the completion rate was 84.1%. For the FFY 2009 (October 2008 through January 2009) the preliminary completion rate is 81.0%. This transmittal provides instructions for QC reviewers when they encounter cases that cannot be completed.

### **INSTRUCTIONS:**

QC reviewers are to use the following instructions for processing cases that cannot be completed. These procedures are based on the Sections 330-338 and 442-442.3 of the FNS Handbook 310. Every reasonable effort must be made to complete active cases except cases not subject to review.

#### **Not Subject To Review (NSTR Code 2)**

If the food stamp household (FSHH) has not been located, yet there is documented evidence that the household existed, the reviewer shall use the NSTR criteria in FNS Handbook 310 Section 442.1 for dropping the case.

In order to use Code 2 (NSTR) the reviewer must use two sources which are most likely to know the household's current address. This could include local homeless shelters (FSHH is homeless), local office of the U.S. Postal Service, DMV, owner or property manager for the case record address, school officials, utility or telephone companies, relatives, or any other sources from the case record.

The source counts for verification purposes only when it provides a response and is properly documented. Note that an acceptable response includes instances in which the source indicates no knowledge of the FSHH's whereabouts. Also the contact must provide feedback. Documentation of these attempts must include the person's name, title (if appropriate), name of the organization, phone number (or indicate no phone), date(s) of contact, and information obtained; see FNS handbook 310 Sections 522 and 523.

If the household has not been located after the responses have been received, the reviewer must document that the FSHH actually existed. The documentation must cover either two elements of eligibility or basis of issuance such as a birth certificate for age, and pay stub for income, or a statement from the landlord or other collateral contact for household composition. The IEVS Report can be used as it validates social security number(s) for the aided members of FSHH. Two sources of verification are required.

As indicated above, the QC reviewer MUST document the efforts to locate the household as well as the evidence that the FSHH did actually exist for the case to be dropped NSTR (Code 2). If documentation is not done, the case will be considered unable to locate (Code 3) and will count against the state's completion rate.

Refer to FNS Handbook 310 Sections 331-338 for additional factors which deem a case NSTR (Code 2). Note in particular that a case is NSTR (Code 2) if all the household members who could be interviewed moved out of state and have not returned by the time the reviewer attempts to contact the household. The availability of an authorized representative for interview does not make this case subject to review.

### **Household Failure or Refusal Cooperate (Incomplete Code 3)**

If the QC reviewer has determined that one or more members have failed or refused to cooperate in completing the quality control review, the QC reviewer shall attempt to complete the case without the household's cooperation. If you are able to determine and verify all of the necessary information without the FSHH's cooperation by using the likely conclusion provisions the case should be completed. If the reviewer is unable to determine and verify all of the necessary information, the case must be dropped as incomplete. All of the steps taken to gain the cooperation of the FSHH and to complete the review must be documented in RADEP.

### **Likely Conclusion**

When it appears that the review cannot be completed because the required verification(s) have not been obtained, the QC reviewer should attempt to complete the case by using the likely conclusion provisions in Section 442.3. It should be based on the eligibility worker's actions in context with the case record, case record information and quality control (QC) findings. For example when the QC reviewer cannot verify the household composition or it is inadequate, the household's statement must be used for household composition (2<sup>nd</sup> bullet in Section 842.5). Another example involves the shelter expenses. When the county has opted not to verify shelter expenses unless it is questionable and the QC reviewer is unable to verify the shelter expense you can accept the eligibility worker's determination unless questionable. If the FSHH moved or you can't find them, or you have information that makes the shelter expense questionable then it must be verified.

Likely conclusions cannot be used for those elements related to non-citizen status, Social Security Number (SSN), and work requirements compliance, employment and bank account information when the IEVS report is the only verification source. In addition, likely conclusions cannot be used when the certification period has expired because actual circumstances must then be used in the review. The QC reviewer must provide documentation on the steps taken to meet the verification standards and how the information gathered from using likely conclusion supports your determination.

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*Original Signed By Richard Trujillo*

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